

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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| U.S. DISTRICT COURT - N.D. OF N.Y. |
| FILED |
| MAY 07 2019 |
| A) O'CLOCK John M. Domurat, Clerk |

EDWARDS, Rashad L.

Plaintiff(s)

vs.

Troy Police Department
 Rensselaer County District Attorney's Office
 Judge Jennifer B. Sober

Defendant(s)

CIVIL
 RIGHTS
 COMPLAINT
 PURSUANT TO
 42 U.S.C. § 1983

Case No.:

1:19-cv-543
(LEK/CFH)Plaintiff(s) demand(s) a trial by: ☒ JURY ☐ COURT (Select only one).

Plaintiff(s) in the above-captioned action, allege(s) as follows:

JURISDICTION

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4) and 2201.

PARTIES

2. Plaintiff: Rashad Edwards
 Address: 4000 Main Street
Troy, New York [12180]

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: Troy Police Department
 Official Position: _____
 Address: 54 State Street
Troy, New York [12180]

b. Defendant: Rensselaer County District Attorney's Office

Official Position: _____

Address: 80 Second Street
Troy, New York 12180

c. Defendant: Jennifer G. Sober

Official Position: Supreme Court Judge

Address: 80 Second Street
Troy, New York 12180

Additional Defendants may be added on a separate sheet of paper.

4. ...

FACTS

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).

On January 13th, 2019, the Troy Police Department unlawfully entered my private home at 491 Pawling Avenue, 2nd floor, Troy, New York. And falsified statements (evidence) in attempt to justify an "emergency exception" for warrantless entry. The Rensselaer County Supreme Court District Attorney's Office knowingly used that false evidence from the Troy Police Department to secure indictment no. 19-1016, on February 14th, 2019, to charge me with a crime that I did not commit. The Rensselaer County Supreme Court Judge Jennifer G. Sober, caused an additional unnecessary physical intrusion on 03/20/19, (violation of my 4th Amendment) by forcing me to submit to a DNA testing to compare with "evidence" that was illegally seized due to the unlawful warrantless entry of my home.

5.

CAUSES OF ACTION

Note: You must clearly state each cause of action you assert in this lawsuit.

FIRST CAUSE OF ACTION

The date that I first discovered the harm was on March 25th, 2019, when public defender John Della Porta submitted police reports to me, in which included other Discovery contents from the DA's office. On January 13th, 2019, the Troy Police Department unlawfully entered my private home at 491 Paulding Avenue, 2nd floor, Troy New York. And submitted false statements (evidence) in an attempt to justify an "emergency exception" of the warrantless entry.

SECOND CAUSE OF ACTION

The Rensselaer County District Attorney's office knowingly used that false evidence from the Troy Police Department to secure indictment 19-1016, on February 19th, 2019, to charge me with a crime that I did not commit. And failed to stimulate efforts for remedial action, after I sent certified mail to the courthouse about the inadequacies and injustices in the substantive and procedural laws.

THIRD CAUSE OF ACTION

The Rensselaer County Supreme Court Judge Jennifer G. Sober caused an additional unnecessary physical intrusion (violation of my 4th Amendment) by forcing me to submit to a DNA testing to compare with "evidence" that was illegally seized due to the unlawfully warrantless entry of my private home.

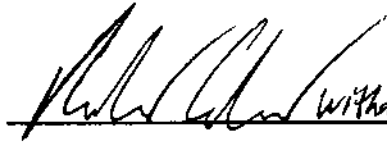
6. PRAYER FOR RELIEF

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

① Immediate dismissal with prejudice of indictment no. 19-1016, for injunctive relief. ② A written ^{West County} recommendation of Revoke and Restore to NYS Parole supervision, for injunctive relief. ③ ^{(lost wages, property in my home,} \$100,000 ^{medical bills, money spent)} for General Damages ④ ^(loss of reputation, dropped my college) \$500,000 for Special Damages ⑤ ^(malicious and egregious conduct of defendants) \$500,000 for Punitive Damages ⑥ \$500,000 ^(PTSD, Depression, Anxiety has worsened) for pain and suffering damages. ⑦ \$500,000 for loss of liberty. In total sum of \$2.1 million, for all damages.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: April 23rd, 2019

 without prejudice
EDWARDS, Rashad L.

Signature of Plaintiff(s)
(all Plaintiffs must sign)

02/2010